



May 6, 2008

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW, TW – A325
Washington, DC 20554

Re: Written Ex Parte Submission in WT Docket No. 07-195

Dear Ms. Dortch:

As the attached Wall Street Journal article illustrates, with the increased mobility of devices able to connect to the Internet, parents are facing an increasingly difficult task of protecting children from unwanted online content. Unfortunately, there are no consistent solutions available in the marketplace and many of the alternatives involve complex device level solutions to activate or monitor by parents and also involve additional monthly expenses. These facts demonstrate the need for a free broadband network in the 2155-2175 MHz band with mandatory network based filtering to protect children from accessing obscene and unlawful content as proposed by M2Z Networks.

Pursuant to Section 1.1206(b) of the Commission rules, an electronic copy of this letter is being filed. Please let me know if you have any other questions regarding this submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Uzoma C. Onyeije', with a long horizontal stroke extending to the right.

Uzoma C. Onyeije

Cc: Mr. Joel Taubenblatt
Mr. David Hu
Mr. Walt Strack
Mr. Martin Liebman
Mr. Peter Daronco
Mr. John Spencer
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Quelling the Danger Lurking In Junior's Backpack

Cellphone Tools Can Filter Uncensored Web and Chat; Parents Risk Privacy Backlash

BY JOSEPH DE AVILA

In the past, some parents worried when their teens holed up in their bedrooms to surf the Web. Now they wonder about their kids' online habits at the mall, in the car or at a track meet. That's because many cellphones now offer Internet access -- making chat rooms and dating sites available from just about anywhere.

Cellphones pose yet another parenting dilemma. On one hand, the devices allow adults to maintain contact with their kids, helping to supervise their activities from afar. On the flip side, advanced features on some phones let kids check email, send instant messages, and visit mobile versions of Web sites. And that's where teens can get into trouble.

Some cellphone carriers offer services for parents to manage how their children use the Web on their phones. While most only block access to certain Web sites, one third-party provider offers a service that alerts parents when their child makes or receives calls, text messages or photos.

Marybeth Whalen, a 37-year-old writer and stay-at-home mom from Charlotte, N.C., recently heard a story that left her shaken. A friend of hers discovered text-message exchanges with sexual innuendo between the friend's teenage daughter and a boy. Ms. Whalen's friend never suspected that her daughter communicated about such things on the phone.

After hearing her friend's experience, Ms. Whalen started to worry about her own kids. "That kind of woke me up a little bit," she says. At 15 and 13, the two oldest of Ms. Whalen's six children have cellphones. "Even the good kids can be up to stuff that you know nothing about."

Now she is more diligent about watching what her kids do with their

phones and tries to stay informed about how they use new gadgets and technology.

Taking a cellphone away entirely would be difficult for many parents -- 72% of teens between ages 13 and 17 already have one, according to a 2007 survey from the Yankee Group, a research and consulting firm.

Among teens, there is a strong demand for text messaging and email on cellphones. Now they want additional features, too, says Chris Collins, a senior analyst with Yankee Group. In a survey, 26% of teens said that having Internet access was a must-have feature for the next phone they bought, according to the Yankee Group.

As mobile Web browsing becomes more common, it will just be another aspect of cellphones that parents need to understand and be informed of, experts say. Monitoring your children's cellphone comes with risks, especially when dealing with teenagers. Communication is essential. Minors should understand why their parents are monitoring them. If not, experts say parents risk alienating and losing the trust of their children.

WHAT'S AVAILABLE

Carriers offer some options for parents to limit what their kids can do with their Web-equipped phones.

Last year, AT&T Inc. launched its Smart Limits plan for \$4.99 a month. The plan lets users limit the number of text and instant messages sent and received.

Parents can block content that may not be appropriate for younger users, like chat rooms and dating sites, on AT&T's home page called MEdia Net, which comes with most of AT&T's basic cellphones. Or they can block access to the Web entirely.

Smart Limits' Web filter doesn't work for the Apple iPhone, and it can't turn off the phone's Web browser,

according to an AT&T spokesman.

Verizon Wireless added new parental controls for cellphones last year. Users can choose from three levels of settings that will filter the content available on the phone based on a rating system that takes the age of the user into account. The most restrictive setting, aimed at kids between the ages of 7 and 12, blocks access to email, instant messaging, social networking sites and chat groups. The free service also filters Verizon's V CAST multimedia player that plays video and music according to the setting chosen by the parent. To sign up, Verizon customers can visit the Web site or call customer service.

These parental settings for the Web aren't available on some older phones and on BlackBerry devices and other smart phones, says Jack McCartney, director for advertising and content standards with Verizon Wireless. The company is working on parental controls for smart phones.

T-Mobile USA Inc. offers a free service called Web Guard that filters mobile Web sites that might be inappropriate for younger users. It automatically blocks the search and browsing of several categories of sites, including dating, gambling and sex sites. The company says the service works on most phones, but may not work at certain times and in certain locations. Users can sign up for the service by logging on to their profile on T-Mobile's Web site.

Sprint Nextel Corp.'s free service is called Web Access and limits Web browsing to about 100 preselected sites that are considered safe for all ages. Parents can turn on the service from their profile on the Sprint Web site or from their child's phone. All other sites are blocked. Email, instant messaging and access to mobile chat rooms can be blocked only by turning off the Web features on the phone itself.

For some parents, blocking features on phones isn't enough. They want to know who their kids are communicating with.

Gregg Friedman, a 46-year-old chiropractor from Phoenix, recently signed up for a third-party application called RADAR to track how his 17-year-old son uses his BlackBerry. Mr. Friedman signed up for the service after his son started getting text messages from bullies and other kids in the neighborhood that Mr. Friedman didn't approve of.

"My wife and I wanted a way to monitor who our son was talking to and texting," he says.

RADAR was launched last year by eAgency Inc., based in Newport Beach, Calif. Here's how it works. The company installs software onto the child's cellphone that monitors incoming and outgoing calls, photos, text messages and emails. Or users can download the software themselves. Parents get an email or text-message alert every time their child uses the phone. (Or they can log on to RADAR's Web site to get these updates.) The text from emails and text messages can be read by the parents. Photos can be seen, too. RADAR also turns off the phone's instant messaging capabilities.

Right now, RADAR software is available only on the BlackBerry Pearl. EAgency will soon release a feature to allow parents to see which Web sites their children visit on their phones, says Bob Lotter, eAgency's chief executive. The service costs \$10 a month, and people can sign up at www.mymobilewatchdog.com.

Mr. Friedman says he and his wife log on to the site a few times each day to check in on their son. His son wasn't happy when he told him that he would be monitored, Mr. Friedman says. His son thought it was an invasion of privacy. "I told him he has no privacy," he says.

Before parents start blocking or checking their children's phones, they should first discuss their worries with their kids, says Amanda Lenhart, a senior research specialist with the Pew Internet & American Life Project, which studies technology and kids. "Whatever you do should be in the context of an open conversation with that child."

A MATTER OF TRUST

Parents who monitor their kids without discussing it first risk losing their trust, says Parry Aftab, executive director of WiredSafety, an Internet-safety help group.

Just because "you can monitor doesn't mean you should or have to," Ms.

Aftab says. At-risk kids, however, are an exception to this rule. In this case, parents should use any technology they can that will help keep the child safe, Ms. Aftab says.

Julie Clark, a 50-year-old freelance writer and Web manager from Cobbs Creek, Va., prefers old-fashioned solutions when dealing with her 16-year-old son, Matthew. On school nights, her son turns over his phone at 9 p.m.

Ms. Clark also limits her son's Web surfing on their home computer. She allows him to use it for school projects only. "The cellphone is a little harder [to monitor] because it's portable," she says. "They can be very secretive with them."

Write to Joseph De Avila at joseph.deavila@wsj.com